

LIST OF UN PAPERS AND US POSITIONS FOR THE 16TH SESSION OF THE SUB-COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS		
AGENDA ITEM	UN PAPER	US POSITION/DISCUSSION
<b>1. ADOPTION OF THE AGENDA</b>		
<b>Adoption of the Agenda</b>	ST/SG/AC.10/C.3/31 and -/Add.1 (Secretariat) Provisional agenda, list of documents and annotations ST/SG/AC.10/C.3/31/Add.2 (Secretariat) Provisional timetable	Note: The Secretariat informed the SCOE that the Czech Republic has been approved by ECOSOC as a full voting member at the UN COE. Observer status was provided to the Compressed Gas Association and the European Cylinder Makers Association.
	<u>Background documents</u> (Secretariat): ST/SG/AC.10/25 and -/Add.1 to -/Add.4 Report of the Committee on its twentieth session (Geneva, 7-16 December 1998)	-----
<b>2. DEVELOPMENT OF PROVISIONS FOR THE TRANSPORT OF GASES</b>		
<b>2 (a) Gas cylinders and other gas receptacles</b>	ST/SG/AC.10/C.3/1999/23 (FEA) Leakproofness test for aerosols and small receptacles for gases	This paper proposed to allow alternative test methods to the water bath test for aerosols and small receptacles for gases. The criteria for the alternative tests would be that they provide at least the same level of safety as the water bath and are approved by the national competent authority. FEA indicated that such approvals would take account of the acceptance of alternative methods in other regulations concerning leak detection, such as EC 75/324/EEC, 49 CFR 173.306, and Australian standard AS 2278. The US indicated that the method in HMR;173.306 is specifically for aerosol containing perishable contents which are sensitive to heat or if the receptacles are made of plastics materials which may soften at the temperatures imposed by the water bath which is already described in UN 6.2.2.1. The US also indicated that it was not convinced that deferring the approval of alternate methods to the competent authority was not appropriate since it would lead to the use of many different methods and would not facilitate harmonization in international transport. The US and several other SCOE participants indicated that they preferred to include any acceptable alternative tests in the Model Regulations. The majority of SCOE participants indicated that they were in favor of developing alternative test methods on this basis. FEA indicated that they would continue their work in developing an alternative method to the water bath test and that they would propose it for incorporation in Chapter 6.2 of the Model Regulation once they have developed an acceptable alternative(s).

	ST/SG/AC.10/C.3/1999/24 (EIGA) Provisions for gas receptacles	At its 15 <sup>th</sup> session, the Sub-Committee decided that final requirements for MEGC's should be delayed pending development of requirements for the gas receptacles which may also be elements of MEGCs. This paper contained proposals for both MEGCs and gas receptacles for incorporation in the Model Regulation. A working group was convened during the Sub-Committee meeting to review and comment on the EIGA proposal. RSPA supports the development of international requirements for pressure receptacles in the UN Model Regulation, but realizes that there is a significant amount of work to be done in meeting this objective. RSPA expressed a number of concerns with respect to the EIGA proposals and agreed to prepare specific proposals for the 17 <sup>th</sup> session of the SCOE to address these issues. Overall, RSPA believes the working group made excellent progress. Revised draft text taking into account the decisions taken by the working group will be available in the near term and can be forwarded to interested persons by email upon request.
	ST/SG/AC.10/C.3/1999/26 (United Kingdom) Amendments to special provisions 63	This paper proposed the standardization of the assignment of subsidiary risk labels to aerosols. The objective was to simplify the shipment of aerosols multi-modally. The proposal would prohibit the transport of aerosols with PG I toxic or corrosive constituents. The proposal was similar to a previous US proposal where the US attempted to amend SP63 to clarify the application of subsidiary risks to aerosols (see -C.3/R.590). The US indicated that it was in favour of modifying SP63 but preferred the approach in ST/SG/AC.10/C.3/R.590 (USA).  The SCOE agreed to defer a decision on aerosols since the UK proposal did not take into account all of the consequences for air transport. It was agreed that the ICAO Dangerous Goods Panel would consider the issue at their upcoming meeting in October 1999 and that the UK would revise their proposal on the basis of the ICAO feedback and comments from other experts.
	ST/SG/AC.10/C.3/1999/35 (Canada) Provisions for gas receptacles and gas cylinders	This paper provided background information regarding the ISO work on gas cylinders and provides a current list and status of development of ISO and other related gas cylinder standards.
	ST/SG/AC.10/C.3/1999/50 (ISO) Work of ISO TC58 (gas cylinders)	This document provided an update on the progress of the ISO technical committee "ISO/TC 58" which is currently working on requirements for gas cylinders.
<b>3. TRANSPORT IN BULK IN PORTABLE TANKS AND FREIGHT CONTAINERS</b>		
<b>3 (a) Miscellaneous draft amendments to Chapters 4.2 and 6.6</b>	ST/SG/AC.10/C.3/1998/3 (Argentina) Portable Tanks (Chapters 4.2 and 6.6)	This paper was deferred because the expert from Argentina was not able to attend the meeting and present his position.
<b>3 (b-c) New provisions for the transport of solid substances in tanks and freight containers</b>	These items were included in the work program following a proposal by the Expert from Germany at the last session of the Committee. No proposal has yet been submitted for this session.	Germany indicated that they would submit a proposal for the 17 <sup>th</sup> session of the SCOE.
<b>4. TRANSPORT OF DANGEROUS GOODS DOCUMENTATION</b>		

	ST/SG/AC.10/1998/33 (Canada) &ST/SG/AC.10/C.3/1999/39 (Canada) Subsidiary risks	In these papers Canada proposed that subsidiary risks be allowed to be shown on the transport document (e.g. in parentheses next to the primary risk). Canada stated that this would be beneficial to emergency responders as a placarded transport unit may contain goods of more than one class. The HMR (see 172.202(a)(2)) allows the subsidiary hazard to be indicated in the basic description but it is not mandatory. The HMR already allows inclusion of the sub risk as an option. ICAO and IMO both require the sub risk on the shipping paper. The proposal was adopted in principle. The SCOE indicated that this should be included in the comprehensive proposal on documentation which will be submitted by CEPE at the next session. At the public meeting in preparation for the 16 <sup>th</sup> session there was general support for the Canadian proposal, but some expressed interest in considering other forms of presentation.
	ST/SG/AC.10/C.3/1999/14 (ICAO) Waste dangerous goods	5.4.1.1.3 in the Recommendations requires that waste dangerous goods (other than radioactive waste) transported for disposal, or for processing for disposal, have the proper shipping name preceded by the word 'WASTE'." ICAO proposed to amend this paragraph to clarify that this is not required if WASTE is already a part of the proper shipping name. The US supported this proposal. The SCOE adopted the proposal.
	ST/SG/AC.10/C.3/1999/37 (CEPE) Proposal to amend Chapter 5.4 Documentation	This paper was originally discussed at the 14 <sup>th</sup> session of the SCOE. It addressed the shipping paper requirements in Chapter 5.4. CEPE has proposed to harmonize shipping paper requirements on the basis of existing requirements in the model, regional, national and international regulations (e.g. UN, IMDG Code, ICAO TI, 49 CFR and ADR/RID). This paper did not provide any new proposals but indicated that the effort is ongoing and that a proposal will be submitted for the 17 <sup>th</sup> session of the SCOE. The US generally supports this effort because it will enhance harmonization of hazard communication requirements, although it does not support any radical amendments to the current shipping paper requirements. During the discussions several European countries indicated that they favoured including the UN number before the proper shipping name in the basic description on shipping papers consistent with the requirements for international road transport and ADR. The US objected and indicated that any such proposal must be submitted in writing due to the significant repercussions it would have in parts of the world which do not use ADR particularly in terms of costs to shippers and the necessity to alter shippers computer data bases.
	ST/SG/AC.10/1998/42 (Austria) Addition of the word "stabilized" or "inhibited" to the proper shipping name	In this paper Austria proposed that the word "STABILIZED" or "INHIBITED" be added as part of the proper shipping name when a substance is offered for transport or transported stabilized or inhibited. The paper pointed out that this information is valuable in that it highlights the fact that a substance has been stabilized or inhibited and for instance that stabilizing agent may have reduced effect after a long journey. The paper cited an incident in which a stabilized material exploded in a rail tank, and notes that the knowledge of it being stabilized would have helped to convey the potential hazard prior to the incident. During the last biennium the Committee agreed to universally use the word "STABILIZED" in the PSN on the basis of a US proposal. The US agreed in part with the Austrian proposal and submitted an INF. paper with some amendments to the Austrian paper. The proposal with the US amendments was adopted by the SCOE.
<b>5. MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS</b>		

<b>5 (a) (i) Listing and Classification:</b> <i>General</i>	ST/SG/AC.10/1998/7 (United States of America) Dangerous goods in machinery or apparatus	This paper proposes a new entry for “Dangerous goods in machinery or apparatus” in the dangerous goods list including a packing instruction for the new entry. This entry was adopted in the HMR as a result of the HM 215-C final rule and was assigned an NA 8000 identification number consistent with the way it is treated in ICAO. The US is proposing a Class 9 classification as opposed to the way it is handled in the ICAO TI and was adopted in HM-215C where the hazard class of the constituents determines the classification.
	ST/SG/AC.10/1998/8 (United States of America) UN 2030, Hydrazine aqueous solutions and ST/SG/AC.10/C.3/1999/7 (United States of America) UN 2030, Hydrazine aqueous solutions	In these papers the US proposed that UN 2030 be amended to remove specific reference to a maximum hydrazine concentration of 64% (by mass), to provide for the classification of aqueous hydrazine solutions in any of the three packing groups and to require a flammable label for solutions in PG I with a flash point of 60.5 C or less. The proposals were adopted.
	ST/SG/AC.10/C.3/1999/1 (IMO) Miscellaneous proposals	This paper proposed to reinstate the old UN numbers together with Special Provision 117 for the following products: UN 1372 Fibres, burnt, wet or damp SP 117 UN 1387 Wool, waste, wet SP 117 UN 1856 Rags, oil SP 117 UN 1857 Textile, waste, wet SP 117 The paper also proposes to allocate two new UN numbers together with Special Provision 117 for the following products: UN 3359 Cargo transport unit under fumigation SP 117 UN 3360 Fibres, vegetable, dry SP 117 The proposal was adopted. However, it was agreed that a special provision covering the requirements for transport applicable to Cargo transport units under fumigation need to be developed and submitted for consideration at the 17 <sup>th</sup> session of the SCOE.
	ST/SG/AC.10/C.3/1999/5 (Sweden) Airbag inflators, air bag modules, seat-belt pretensioners	In this paper Sweden proposed to amend Special Provision 235 by deleting the last sentence “If the air bag inflator unit satisfactorily passes the series 6(c) test, it is not necessary to repeat the test on the air bag module itself.” The US indicated that it did not believe the Swedish paper provided sufficient justification for removing the exception for testing air bag modules, nevertheless the SCOE adopted the proposal.
	ST/SG/AC.10/C.3/1999/6 (Germany) UN 2030, Hydrazine aqueous solutions	Germany withdrew this paper and supported the US proposal in 1999/7.

ST/SG/AC.10/C.3/10 (ICAO) UN 3166	In this paper ICAO proposed to amend the proper shipping name for UN 3166 to ENGINE, INTERNAL COMBUSTION, including when fitted to machines or equipment or VEHICLE, FLAMMABLE GAS or FLAMMABLE LIQUID POWERED. The SCOE adopted the proposal. The proposal is consistent with recent amendments to the ICAO TI and the HMR which were incorporated as a result of HM-215C.
ST/SG/AC.10/C.3/1999/11 (ICAO) UN 2680	This paper proposed to: 1. Delete MONOHYDRATE from the proper shipping name LITHIUM HYDROXIDE, MONOHYDRATE. 2. Delete "organic" from the text for Column 2 of Chapter 3.2. 3. Move the text "Hydrates of substances may be included under the proper shipping name for the anhydrous substance" to 3.1.2 as a new paragraph. The SCOE adopted the proposal.
ST/SG/AC.10/C.3/1999/18 (United States of America) Refrigerating machine components	This paper proposed to amend SP 119 and SP 291 by adding the words "and refrigerating machine components" immediately following the words "Refrigerating machines" in both special provisions. The proposal was adopted. This amendment, once adopted in regulations, will authorize the shipment of refrigerating components under the same exceptions as refrigerating machines.
ST/SG/AC.10/C.3/1999/30 (Germany) New entry for solvent free acetylene	This paper proposed the addition of ACETYLENE, SOLVENT FREE to the UN DG List to eliminate the need for special authorization or agreements for transporting acetylene solvent-free. The solvent free acetylene is not widely used in the US. From a safety perspective the solvent free acetylene under specified conditions may pose less risk in transport than the acetylene dissolved in acetone. The German proposal did not propose these conditions for inclusion in the Model Regulation. The SCOE deferred the paper to the gas receptacles working group for consideration at the 17 <sup>th</sup> session of the SCOE.
ST/SG/AC.10/C.3/1999/44 (United States of America) Classification of silicon tetrachloride and chlorosilanes	This paper proposed that the entry, Propyltrichlorosilane, UN 1816, be amended to indicate a primary hazard of Division 6.1, Packing Group II with Subsidiary Risks of Class 8 and Class 3 and that the entry, Silicon tetrachloride, UN 1818, be amended to indicate a primary hazard of Division 6.1, Packing Group II with a subsidiary risk of Class 8. The paper also proposed that the following two new n.o.s. entries be added to the Dangerous Goods List: 1) Chlorosilanes, Toxic, Corrosive, n.o.s.. 2) Chlorosilanes, Toxic, Corrosive, Flammable n.o.s. The SCOE did not adopt the proposals for Propyltrichlorosilane, UN 1816 and Silicon tetrachloride, UN 1818 on the basis for a majority of experts favouring to maintain a Class 8 primary hazard classification however the proposals to add two new n.o.s. entries was adopted.
ST/SG/AC.10/C.3/1999/48 (United States of America) Methyl bromide with up to 2% chloropicrin	This paper proposes that additional italicized text be added to column 2 of the dangerous goods list following the proper shipping name for methyl bromide to allow the presence of up to 2% chloropicrin as an odorant gas. The proposal was adopted.
ST/SG/AC.10/1998/45 (France) Ammonium nitrate based emulsions	In this paper France proposed a new entry for "Ammonium nitrate emulsion". The US supported this paper principle but indicated that the criteria for applying the proposed shipping description needs further consideration due to the wide variations in the chemical compositions of ammonium nitrate emulsions. Other experts agreed with this position and it was agreed that a working group would be convened in Norway from October 4-8, 1999 to develop appropriate classification criteria, to analyze emulsion properties in order to determine appropriate test methods and criteria, to consider the need for a new test method for AN emulsions and to develop a proposal for consideration at the 17 <sup>th</sup> session of the SCOE.

ST/SG/AC.10/C.3/1999/34 (Canada) Creation of a New Entry - Ammonium Nitrate Emulsion Matrix	In this proposal Canada indicated that the French proposal (1998/45) did not clearly define the properties of the emulsion matrices that would be covered in their proposals. Canada expressed concern that this could lead to serious situations, especially since a fire in a Class 5.1 product may not lead to the same emergency response procedures that would result from an incident involving a Class 1 product. As indicated above the US shares many of the concerns raised in this paper and these concerns will be addressed by the working group.
ST/SG/AC.10/C.3/1999/40 (EFMA) Review of the listings for Ammonium Nitrate Fertilizer	In this paper EFMA commented on its ongoing work regarding the listing and classification of Ammonium Nitrate Fertilizers and proposes to develop and prepare a scheme to simplify the various entries and to improve their definitions to reflect the nature of the products which currently exist in commerce. The US generally supported this work and provided comments in an INF paper (INF.15). In the INF paper the US proposed: - that the word "Fertilizer" should be allowed in the proper shipping name when the product is intended to be used as a fertilizer; - addition of a new special provision to preclude ammonium nitrate formulations possessing explosive properties from being transported under a Division 5.1 classification; - deleting the entries for UN 2067, 2068, 2069, 2070 and 2072; - creating a new entry for "Ammonium nitrate mixed fertilizer with more than 70% ammonium nitrate but not more than 90% ammonium nitrate; and - to revise SP 193. The US and Canada agreed to provide a joint submission to the December session.
ST/SG/AC.10/C.3/1999/47 (Norway) Creation of a new entry "Ammonium nitrate based emulsion" Comments on ST/SG/AC.10/1998/45	This paper commented on the French paper (ST/SG/AC.10/1998/45) concerning AN emulsions. It supported the French proposal with several proposed modifications. As discussed above, the working group has been tasked to develop a proposal for the next session of the SCOE.
<u>New documents:</u>	
ST/SG/AC.10/C.3/1999/8 (South Africa) Lithium Batteries	In this paper South Africa pointed out that lithium batteries are entered under "Lithium" and that this creates difficulties for users in finding the lithium battery entries in the alphabetical list. The paper proposes that the current entries for lithium batteries be amended as follows: UN 3090; BATTERIES, LITHIUM UN 3091; BATTERIES, LITHIUM, CONTAINED IN EQUIPMENT UN 3091; BATTERIES, LITHIUM, PACKED WITH EQUIPMENT. The SCOE agreed to amend the index in the Model Regulation to provide a cross reference for batteries, lithium...
ST/SG/AC.10/C.3/1999/29 (Japan) Lithium Batteries	This paper proposed to amend the provisions for lithium batteries. (see discussion below re:ST/SG/AC.10/C.3/1999/36 (Canada).

	ST/SG/AC.10/C.3/1999/36 (Canada) Lithium Batteries	<p>In this paper Canada proposed that an informal Working Group be established to develop new text for consideration by the Sub-Committee of Experts which would replace the existing text in the Model Regulations and in the Manual of Tests and Criteria related to lithium and lithium-ion cells and batteries. The US and several other experts indicated that the paper lacked a clear justification for the proposed amendments. The SCOE agreed that a new proposal should be prepared by Japan and Canada on the basis of comments developed by a correspondence group for the 17<sup>th</sup> session of the SCOE and that the group should take into account:</p> <ul style="list-style-type: none"> <li>-the risks involved in the transport of lithium batteries;</li> <li>-the relevance of current lithium battery provisions according to battery sizes; and</li> <li>-the clarity and comprehensiveness of current test methods and criteria.</li> </ul>
<b>5 (c) Chapter 3.4 (Limited quantities)</b>	ST/SG/AC.10/1998/12 (CEPIC) Consumer products and pharmaceuticals	In this paper CEPIC proposed that for pharmaceuticals, animal health products, and various personal care products, intended for personal use by consumers or to be administered by medical and/or veterinary personnel, the General Provisions in Chapter 1.1 of the Model Regulations should provide for conditions under which such substances are not subject to the transport regulations. This proposal was not adopted.
	ST/SG/AC.10/C.3/1999/16 (AISE) Chapter 3.4 (Limited Quantities) and ST/SG/AC.10/C.3/1999/41 (United Kingdom) Chapter 3.4 (Limited quantities)	These papers addressed the problems which are caused by variations in package marking requirements for limited quantities in regional and national regulations and proposes new marking requirements. The UK and US also submitted INF papers concerning limited quantity provisions. The UK paper addressed the inconsistencies of package markings for limited quantities in different national regulations, and proposed that limited quantities packagings be marked with the UN number or numbers in a rectangular box. The US indicated that there are benefits to be gained in harmonizing the hazard communication requirements for limited quantity and consumer commodity shipments. There was a general discussion with respect to limited quantity provisions. The SCOE agreed that limited quantity provisions need to be harmonized but could not decide on specifics because there were sharply divided views on principles such as documentation and package marking requirements. Some experts indicated that they could not support eliminating documentation requirements for limited quantity shipments and while others supported such a view. There were mixed views on the need for differentiating between consumer commodities and limited quantities as a whole. There were various views concerning use of a pictogram or marking including a UN number(s). After a lengthy discussion the SCOE agreed that the UK should submit a revised proposal for the 17 <sup>th</sup> session and that countries with specific proposals should submit them in formal proposals.
	ST/SG/AC.10/C.3/1999/17 (United States of America) Limited quantities Nitrocellulose Membrane Filters (UN 3270)	In this paper the US proposed to allow up to 500 g of Nitrocellulose Membrane Filters (UN 3270) as a limited quantity. The proposal was adopted.
	ST/SG/AC.10/C.3/1999/38 (Japan) Amendment to requirements on the limited quantities for self-reactive substances	In this paper Japan proposed to allow limited quantities for certain self-reactive substances (UN Nos. 3221-3230). This is consistent with the limited quantity provisions for organic peroxides. The proposal was adopted.
	ST/SG/AC.10/C.3/1999/INF (United States) Chapter 3.4 (Limited quantities) Comparison of inner and outer packaging capacity limits	This paper provided a comparison of the maximum capacities for inner packagings and the maximum gross masses for outer packagings applicable to limited quantities for various substances authorized to be transported under limited quantity exceptions provided in various transport regulations (i.e. UN Model Regulation, the IMDG Code, the RID/ADR Agreements and the US Hazardous Materials Regulations). The limitations in the ICAO Technical Instructions were not taken into account because they are generally more restrictive due to the conditions concerning transport by aircraft. The SCOE asked the US to develop a formal proposal for the 17 <sup>th</sup> session of the SCOE.

<b>5 (d) Packagings</b>	ST/SG/AC.10/1998/5 (India) Testing and shipping of IBCs	This proposal was not considered because the expert from India was not present to introduce the paper.
	ST/SG/AC.10/C.3/1999/3 (Argentina) Testing and shipping of packagings	This proposal was not considered because the expert from Argentina was not present to introduce the paper.
	ST/SG/AC.10/C.3/1999/9 (South Africa) Date marking on IBCs	This expert from South Africa agreed to submit a revised proposal.
	ST/SG/AC.10/C.3/1999/12 (ICAO) Salvage packagings	This paper outlined additional restrictions which pertain to the provisions for salvage packagings in the ICAC TI. The SCOE agreed that it was not necessary to include the more restrictive ICAO provisions in the UN Model Regulation.
	ST/SG/AC.10/C.3/1999/13 (ICAO) Specification marking	This paper proposed to clarify that the “/” in the examples of markings for new, reconditioned and salvage packagings (as given in the note after paragraph 6.1.3.8) is optional. The SCOE adopted this proposal.
	ST/SG/AC.10/C.3/1999/15 (ICAO) Miscellaneous	This paper made a number of suggestions to align the UN Recommendations with the Technical Instructions. Many of the suggestions were simply editorial changes of minor consequence which were discovered when the ICAO Dangerous Goods Panel reviewed the ICAO TI with respect to revising it in accordance with the UN Model Regulation. Some of the existing ICAO text is more precise and clear and ICAO is proposing to revise the UN Recommendations accordingly. The US supported the majority of these proposals and led a working group which considered each proposal and provided recommendations to the SCOE. The SCOE adopted the working groups recommendations (see CRP.2).
	ST/SG/AC.10/C.3/1999/20 (United Kingdom) "W" marking for large packagings	During the last biennium a proposal from the expert from the USA was adopted to align the marking provisions for IBCs with those of packagings by including a provision for a "W" mark. This proposal proposed that a similar provision be adopted for large packagings. The SCOE adopted this proposal.
	ST/SG/AC.10/C.3/1999/22 (Spain) Amendment to 6.1.4.1.1	This paper proposes a minimum wall thickness requirement for metal drums and light metal packages. In the HMR minimum thickness requirements are provided for the purpose of indicating whether drums may be reconditioned otherwise the thickness is left to performance standards. While several experts agreed that there were problems with thin walled drums, opinions were divided as to whether specifying minimum thicknesses was necessary. The US reminded the SCOE that the US had proposed additional testing for UN packagings including a puncture test and a vibration test and indicated that it did not support including minimum thickness requirements in the Model Regulation since this would be contrary to the performance based approach. The US indicated that governments should focus greater emphasis on ensuring that packagings conform to the requirements in the Model Regulation. Furthermore, the US stated that competent authorities and parties with specific concerns regarding the existing requirements should substantiate their concerns using incident data. The SCOE did not support the proposal.
	ST/SG/AC.10/C.3/1999/28 (ICPP) Pressure-relief devices for IBCs	This paper proposed to delete the requirements for pressure relief devices for rigid plastics IBC's and composite IBC's with plastics inner receptacles by deleting paragraphs 6.5.3.3.6 and 6.5.3.4.10. The SCOE adopted the proposal.



	ST/SG/AC.10/C.3/1999/32 (ICIBCA) Vapour pressure limitations	This paper proposed to remove all reference to restrictions on the vapour pressure for liquids permitted to be transported in IBCs. ICIBCA proposed that liquids should be permitted to be transported in metal IBCs on the basis of the IBCs ability to withstand a hydraulic test based on the vapour pressures of the liquids intended to be transported. The SCOE did not adopt this proposal. The majority of experts indicated that since IBCs were not built in accordance with pressure vessel codes that they were not appropriate for high vapour pressure liquids.
	ST/SG/AC.10/C.3/1999/33 (ICIBCA) Editorial changes to Chapter 6.5	This paper proposed to clarify the UN text regarding IBCs, by using the terms "fill", "filled" and "filling" to refer to the contents of an IBC and "load", "loaded" and "loading" to refer to superimposed masses and other matters external to the IBC. While the SCOE agreed in principle with this proposal, it asked ICIBCA to resubmit their proposal since some substantive amendments had been inadvertently introduced into the proposed text.
	ST/SG/AC.10/C.3/1999/42 (Italy) Reconditioned packagings	This paper proposed to clarify the reconditioning requirements to make the reconditioning process more clear and controlled. On the basis of this proposal, the SCOE agreed to amend paragraphs 6.1.1.4, 6.1.3.2 and 6.1.3.4(i) to clarify the reconditioning requirements (see CRP.2).
<b>5 (e) Tanks</b>	Proposals concerning this sub-item have been grouped under item 3(a) or other appropriate items.	
<b>5 (f) Infectious substances</b>	INF.19 World Health Organization (WHO)	The WHO representative highlighted difficulties of applying the current infectious substances requirements to hospital wastes and presented a draft proposal. Interested parties were encouraged to send comments to WHO. The UK, Germany, and WHO agreed to prepare a joint proposal.
	ST/SG/AC.10/1998/48 (Germany) Packing of diagnostic specimens	In this paper Germany proposed the adoption of an alternative packaging to that specified in 2.6.3.3.2 for diagnostic specimens. The UK also made a proposal concerning the transport of diagnostic specimens in INF 24. The SCOE agreed in principle that the requirements for transporting diagnostic specimens should be simplified to allow medical professional and laboratories to more easily comply with the requirements. The UK and Germany were asked to prepare a joint proposal for the 17 <sup>th</sup> session of the SCOE.
<b>5 (g) Toxic by inhalation</b>	ST/SG/AC.10/C.3/1999/49 (United States of America) Packaging of substances that are toxic by inhalation	This paper proposed to consistently apply packing instructions to TIH substances based on their volatility to LC50 ratio. A risk analysis was provided to justify the proposal. Although there was support from a number of delegations which indicated that toxic by inhalation substances pose a major risk in transport if not adequately packaged, there was resistance by a number of delegations to the proposal. The proposal was not adopted. The SCOE did agree that there should be a rational approach to assigning packaging requirements to TIH substances.
<b>5 (h) Segregation</b>	ST/SG/AC.10/C.3/1997/89 (United States of America) Segregation of dangerous goods	This paper was submitted as a basis for incorporating segregation requirements into the Model Regulation to cover the sea, road and rail modes of transport. Further discussion of this item was delayed until Germany completed a research project.

	ST/SG/AC.10/C.3/1999/43 (Netherlands) Segregation	This paper proposed that due to the differences in requirements between modes, it is not appropriate to develop comprehensive multi model segregation requirements. Instead, the paper suggested that the UN give a basic explanation in its Recommendations of dangerous reactions between incompatible dangerous goods, such as is described in para. 4.1.1.6 for dangerous goods packed together in the same outer packaging. The SCOE disagreed with this view and concluded that a multimodal approach would be beneficial. The expert from Germany indicated that an international working group planned to meet in Germany to revise the IMO requirements applicable to segregation of dangerous goods in Cargo Transport Units (CTUs) and between CTUs. He indicated that a formal proposal would be developed for DSC5 which will meet in February 2000 and that an INF paper could be developed for the 17 <sup>th</sup> session of the SCOE. The SCOE agreed to consider the matter pending the submission of the German proposal.
<b>5 (i) Organic peroxides/Self-reactive substances</b>	ST/SG/AC.10/C.3/1998/56 (Finland) Peroxyacetic acid in IBCs and tanks	This paper proposed to amend Packing Instruction 521, UN 3109, ORGANIC PEROXIDE, TYPE F, liquid, and to add an entry in the appropriate T-code (T34) for Peroxyacetic acid. Several experts had indicated at the 20 <sup>th</sup> COE that the corrosivity of the product made further consideration of this paper necessary. CEFIC expressed some concern with regard to the proposal. The SCOE agreed to consider this matter on the basis of a joint paper from CEFIC and Finland.
	ST/SG/AC.10/1998/13 (CEFIC) List of self-reactive substances and ST/SG/AC.10/C.3/1999/21 (CEFIC) List of self-reactive substances	In CEFIC's proposal they proposed to add four products to the list of currently assigned self-reactive substances in 2.4.2.3.2.4 in order to permit their transport under appropriate conditions. CEFIC pointed out that approvals for the transport of these products have been granted in Germany and in the United States of America without any negative consequences. The proposal was adopted with some minor drafting amendments.
<b>5 (j) Explosives</b>	ST/SG/AC.10/C.3/1999/4 (Sweden) Airbag inflators, air bag modules, seat-belt pretensioners	In this paper Sweden proposed a new UN number for AIR BAG INFLATORS, pyrotechnic; AIR BAG MODULES, pyrotechnic; SEAT-BELT PRETENSIONERS, pyrotechnic division 1.4S. The US indicated that it regretted the continuous amendments to the air bag requirements owing to the fact that over 300,000,00 shipments had been made safely without any reported incidents. The SCOE did not adopt this proposal.
	ST/SG/AC.10/C.3/1999/19 (Norway) Mixed transport of goods of Class 1 with other dangerous goods	This paper by Norway proposes to add text to the Recommendations regarding transport of mixed loads was adopted.
	ST/SG/AC.10/C.3/1999/45 (United States of America) Packing instructions for Class 1	This paper proposed several minor amendments to explosives packing instructions. The paper was submitted based on a request from the DOD. The proposal was adopted.
<b>6. DRAFT AMENDMENTS TO THE MANUAL OF TESTS AND CRITERIA</b>		
<b>Explosives Tests</b>	ST/SG/AC.10/C.3/1999/2 (Russian Federation) Determination of sensibility of powdered explosives under vibration influence	This paper addresses the development of a test for the determination of sensibility of powdered explosives under vibration influence. The proposal was deferred to the 18 <sup>th</sup> session of the SCOE on the basis of a request from the Russian expert.
	ST/SG/AC.10/C.3/1999/31 (Germany/Canada) 1.4S classification	This paper proposes to expand the scope of Series 6 type (a) test in order to account for certain aspects which were overlooked by the 6(c) test, specifically how well effects from accidental functioning of a packaged substance or article are confined within the package. The US did not support this paper because the proposal includes new criteria which is not consistent with existing explosives classifications. The SCOE did not adopt this proposal.
<b>7. GLOBAL HARMONIZATION OF SYSTEMS OF CLASSIFICATION AND LABELLING OF CHEMICALS</b>		

<b>7 (a) General</b>	ST/SG/AC.10/25, paras. 108-131 and Annex 6 Report of the Committee on its 20th session	
<b>7 (b)(i) Health hazards</b>	The Committee agreed that the Sub-Committee should consider adapting the existing criteria for toxic substances to those proposed by OECD in the context of global harmonization (ST/SG/AC.10/25, para. 118). No proposal has yet been submitted in that respect. (For the criteria proposed by OECD, see also informal document UN/CETDG/20/INF.20 distributed during the Committee's 20th session.)	

	<p>ST/SG/AC.10/C.3/1999/27 (United Kingdom)  Environmentally hazardous substances <b>and</b>  INF.27 (United Kingdom)  Criteria for environmentally hazardous substances</p>	<p>This paper included proposals for the inclusion of provisions for the transport of packaged environmentally hazardous substances in the UN Model Regulations. The paper included the criteria developed by an OECD working group on environmental hazards. Criteria for classifying mixtures and a guidance document for dealing with special substances which are still being developed by OECD. The US supported the inclusion of the OECD criteria in the UN Model Regulation and recommended that the UK paper be used as a basis for adopting environmental criteria in the UN Model Regulations. Other experts generally supported the inclusion of the OECD criteria presented in the UK paper for inclusion in the Model Regulation. Other pertinent issues discussed included:</p> <ul style="list-style-type: none"> <li>-Some experts indicated that the criteria for substances which pose a danger to the environment should not be included in the Model Regulation until OECD completes its work and a “full package” (i.e. including criteria for mixtures and guidance document for difficult substances) of requirements can be adopted. The majority of experts indicated that they could support the inclusion of the criteria in the Model Regulation. OECD indicated that they intend to complete their work on mixtures and a guidance document by December 1999. The SCOE agreed that the UK should develop a revised proposal taking account of the comments by various SCOE participants.</li> <li>-The US indicated that the aquatic toxicity criteria could be used as a basis for all substances which pose a danger to the environment since the aquatic environment is generally the most sensitive.</li> <li>-The majority of experts favoured including environmentally hazardous substances under Class 9 as opposed to a new 6.3 subdivision as proposed by Germany.</li> <li>- The majority of experts favored including both chronic and acute toxicity criteria as opposed to only acute criteria for transport criteria.</li> <li>-The majority of experts favored including a criteria based system as opposed to a list based system as currently appears in the IMDG Code. However, a number of experts indicated that a list of substances known to be aquatically toxic to the environment could be used to supplement the criteria based system to reduce the need to conduct testing especially for the most commonly transported substances. Several experts indicated that a data base could be developed and maintained by a body other than the UNCOE and that incorporation of a list of environmentally hazardous substances in the UN Model Regulation would be inconsistent with recent decisions such as removal of the pesticides list. The majority of experts indicated that maintenance of a list would place an extreme burden on the UNCOE.</li> <li>-OECD indicated that it has not made any significant progress in developing criteria for the terrestrial environment and that the aquatic toxicity will most likely form the basis for overall environmental criteria. OECD favours the use of both chronic and acute criteria in the environmental criteria scheme. OECD is not intending to develop or maintain a list or database of aquatically toxic substances.</li> </ul> <p><i>Note: RSPA published a federal register notice on March 25, 1999 inviting public comments on the criteria and their incorporation in the UN Recommendations. Comments in response to the notice were used to develop the US position to the UK paper.</i></p>
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	ST/SG/AC.10/C.3/1999/46 (United States of America) Environmentally hazardous substances	In this paper the US addressed the need to propose additional criteria for large volume packagings of environmentally hazardous substances transported in large volume packagings (i.e. greater than 3000 litres) such as portable tanks, tank trucks and rail tank cars. The US indicated that it is evaluating the need for including a toxicity level cut-off of 100 ppm for large packagings. The US requested the views of other delegations on whether it would be appropriate to include additional environmental criteria for substances transported in large volume packagings or conversely why it may not be appropriate to regulate substances that are less toxic than those proposed for regulation in the United Kingdom document (1999/27). While most experts agreed that spills from large packagings pose a greater risk to the environment, and acknowledged that OECD includes such criteria in their proposed system, they indicated that they did not support establishing a 100 ppm toxicity level for substances transported in large packagings. There was no support for including a 100 ppm toxicity level for large packagings as an element of the UN transport criteria for environmentally hazardous substances.
<b>7(c) Physical Hazards</b>	The Committee at its 20th session approved the proposals (ST/SG/AC.10/C.3/28/Add.3) prepared by the UN/ILO Working Group on physical hazards (see ST/SG/AC.10/25, para. 121). For proposals concerning the flammability of aerosols, the Committee agreed that the ILO/UN Working Group should meet during the Sub-Committee's session in December 1999 to finalize the criteria. OECD provided an update and posed 4 questions to the SCOE.	<p>OECD explained that criteria for mixtures is ongoing and is hoped to be completed by December 2000. OECD plans to have their first comprehensive proposal for the classification of mixtures completed in time for their November 8-9, 1999 meeting. OECD also agreed to develop a better definition of the terms "mixture" and "classification" for inclusion in the GHS. For acute toxicity, the OECD mixtures group agreed that the UN Transport mixtures calculation procedure which is used when all of the ingredients are known is a very viable procedure which could be used in the GHS. OECD plans to further consider adopting the UN transport procedure on the basis of a comparison with other classification of mixtures schemes. In the case where all of the constituents do not have known toxicities, more work needs to be done.</p> <p>The SCOE also considered the questions posed by OECD in INF.31. The SCOE responded to the OECD questions as follows:</p> <p>a) Should the UN Transport mixtures calculation procedure be used in the GHS? The SCOE indicated that for acute toxicity this method should be maintained. Other methods could be used and should be considered especially those methods which address mutagenic, carcinogenic and reproductive toxicity characteristics of mixtures. The OECD expert indicated that a listing of the various existing calculations methods is currently available on the Internet.</p> <p>b) Should other approaches (cut-off values) be used? The SCOE considered it premature to take a decision until the phase 2 document is completed by OECD, However, the SCOE agreed that all methods should be considered.</p> <p>c) Should the proposal for including wastes be supported? Yes, as long as this is limited to hazardous waste. The SCOE highlighted the fact that the UN Model Regulation already takes into account provisions for the transport of wastes.</p> <p>d) How should mixtures of environmentally hazardous materials be addressed? The SCOE agreed that OECD should continue its work in developing criteria for the evaluation of mixtures of environmentally hazardous materials.</p>

<b>7(d) Hazard Communication</b>	<p>The Sub-Committee was informed of the outcome of the June session of the ILO Working Group for the Harmonization of Chemical Hazard Communication (Dublin, 23-25 June 1999). The SCOE was asked to consider the issue of phased implementation and the development of a database of chemicals</p>	<p>The SCOE indicated that it would be premature to discuss the restructuring of the Committee of Experts until ECOSOC takes a decision on the resolution developed at the 20<sup>th</sup> session of the UN COE.</p> <p>The US indicated that the SCOE should consider when to adopt the GHS criteria into the UN Model Regulations and whether the new criteria should be considered when new substances are considered for incorporation in the Dangerous Goods List or in considering amendments to existing classifications on the basis of specific proposals. The US asked that the SCOE consider how and when to revise the criteria in the Model Regulation which differs from the GHS criteria (e.g. criteria for acute oral toxicity). The US recommended expeditious adoption of the new GHS criteria.</p> <p>The SCOE considered hazard communication on the basis of INF.23 which included a report by the SCOE chairman of the ILO Working Group for the Harmonization of Chemical Hazard Communication which was held in Dublin from 21 to 23 June 1999. Many SCOE members indicated that they found it difficult to comment on which elements of the transport system in which they are willing or unwilling to change. The SCOE agreed to maintain an objective position in regard to developing a harmonized hazard communication system. The SCOE agreed to maintain an open and objective view in considering alternatives for the purposes of harmonization but stressed that the relevance of specific aspects of the transport hazard communication system must be considered. It was also noted that the meaning of “labelling” needs to be pinned down since many regulatory systems use a combination of labelling and package or product markings.</p>
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*\*UN Papers for the 16<sup>th</sup> session may be downloaded from the UN Transport Division web site at: <http://www.unece.org/trans/main/dgdb/dgsubc/c3doc.html>. Visit the site of the Office of Hazardous Materials Safety’s International Standards Coordinator for pertinent information relative to the office’s international activities including: Schedules of International Meetings, The UN Recommendations on the Transport of Dangerous Goods (UN Model Regulation), The UN Committee and Sub-Committee of Experts on the Transport of Dangerous Goods, International Atomic Energy Agency International Maritime Organization’s Dangerous Goods, Solid Cargoes and Containers (DSC) Sub-Committee, International Civil Aviation Organization (ICAO) Dangerous Goods Panel European Agreements Concerning the International Carriage of Dangerous Goods by Road (ADR) and Rail (RID) North American Free Trade Agreement (NAFTA) Hazardous Materials Land Transportation Standards Sub-Committee at: <http://hazmat.dot.gov/intstandards.htm>.*